

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
Squirrels Research Labs LLC <i>et al.</i> , ¹)	Case No. 21-61491
)	(Jointly Administered)
Debtors.)	
)	Judge Russ Kendig

STATUS REPORT PURSUANT TO 11 U.S.C. § 1188(c)

Now comes Squirrels Research Labs LLC and The Midwest Data Company LLC, the Debtors and Debtors in Possession in the above case, by and through their undersigned counsel, and hereby submit this status report pursuant to 11 U.S.C. § 1188(c). For their Status Report, the Debtors state as follows:

1. On November 23, 2021 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under Subchapter V of Chapter 11 of the Bankruptcy Code.
2. Each of the Debtors is operating its business as a debtor in possession pursuant to section 1184 of the Bankruptcy Code.
3. The Court has entered various orders granting the Debtors certain relief including the following orders:
 - a. Order Granting Motion of Debtors and Debtors-in-Possession for Joint Administration of Chapter 11 Cases Pursuant to Bankruptcy Rule 1015(b);

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

- b. Interim Order: (I) Authorizing Secured Postpetition Financing on a Superpriority Basis Pursuant to Section 364 of the Bankruptcy Code; (II) Modifying the Automatic Stay; and (III) Granting Related Relief;
- c. Final Order: (I) Authorizing Secured Postpetition Financing on a Superpriority Basis Pursuant to Section 364 of the Bankruptcy Code; (II) Approving DIP Loan and Security Agreement with Instantiation LLC; and (III) Granting Related Relief;
- d. Order: (A) Prohibiting Utilities From Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtors on Account of Prepetition Invoices; (B) Determining that the Utilities are Adequately Assured of Future Payment; and (C) Establishing Procedures for Determining Requests for Additional Assurance;
- e. Order Approving Stipulation Resolving Motion and Memorandum of Ohio Power Company d/b/a American Electric Power (“AEP”) to: (I) Vacate, and/or Reconsider, and/or Modify Order: (A) Prohibiting Utilities from Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtor on Account of Prepetition Invoices; (B) Determining that the Utilities are Adequately Assured of Future Payment; and (C) Establishing Procedures for Determining Requests for Additional Assurance; and (II) Determine Adequate Assurance of Payment as to AEP;
- f. Order Establishing General and Government Claims Bar Dates and Approving Form and Manner of Notice Thereof;

4. The Debtors have served the Bar Date Notice on all known creditors, establishing February 20, 2022, as the last day for creditors, other than governmental creditors, to file proofs of claim.

5. The Debtors have filed their schedules, statement of financial affairs, all financial reports required by section 1116 of the Bankruptcy Code, and their initial Monthly Operating Reports on December 21, 2021.

6. The Debtors also attended the initial debtor interviews on December 2, 2021, with the United States Trustee's office and have provided and continue to provide the United States Trustee's office with the requisite documents. The Debtors will attend the 341 Hearing scheduled for January 14, 2021 at 10:30 a.m.

7. The Court also entered an Order (I) Approving Bidding Procedures, (II) Approving Stalking Horse Bid Protections, (III) Approving Contract Assumption and Assignment Procedures and the Form and Manner of Notice Thereof, (IV) Scheduling the Auction, (V) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (VI) Approving the Form and Manner of Notice Thereof, and (VII) Granting Related Relief.

8. The Debtors are marketing their assets for sale. The auction, if any qualified competing bids are submitted, is scheduled for January 3, 2022 and the Sale Hearing is scheduled for January 11, 2022 at 2:00 p.m.

9. The Debtors will discuss this report and any additional supplemental information at the status conference scheduled for January 11, 2022 at 2:00 p.m.

Dated: December 28, 2021

Respectfully submitted,

/s/ Julie K. Zurn

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